



U.S. Department of Justice

United States Attorney  
Southern District of New York

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86 Chambers Street  
New York, New York 10007

June 6, 2023

**By ECF**

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *D.J.C.V., et al. v. United States of America*, No. 20 Civ. 5747 (PAE)

Dear Judge Engelmayer:

This Office represents defendant United States of America (the “Government”) in the above-referenced action brought under the Federal Tort Claims Act, 28 U.S.C. §§ 1346(b), 2671 *et seq.* Pursuant to the Court’s June 2, 2023 Order (ECF No. 195), today the Government is filing under seal proposed redactions to its opening jurisdictional brief in further support of its Motion to Dismiss the Complaint Pursuant to Federal Rule of Civil Procedure 12(b)(1) (*see* ECF No. 192) and supporting declarations and associated exhibits (*see* ECF Nos. 187-191, 193). The Government is also filing versions of these same documents on the public docket, bearing redactions that match the highlighted proposals filed under seal.

In preparing these redacted copies, the Government realized that it inadvertently neglected to replace several “placeholder” record cites in its Memorandum of Law (ECF No. 192) with correct pincites to the supporting declarations and their exhibits or other portions of the brief. The Government has corrected these errors in the versions of the Memorandum of Law filed today. In addition, the Government has filed corrected versions of Exhibit A to the Grame Declaration (originally filed at ECF No. 193-1) and Exhibit A to the Cavazos Declaration (originally filed at ECF No. 191-1) because incorrect versions of those documents were inadvertently filed last week.

We apologize for any confusion and thank the Court for its attention to these matters.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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cc: Plaintiffs' counsel (by ECF)